

1 REMARKS

2 Status of the Claims

3 Claims 1 – 49 remain pending in the application. No amendments have been entered in this
4 response.

5 Claims Rejected under 35 U.S.C. § 102(a)

6 Claims 1-4, 6, 15-20, 22, 31-36, 38, and 47-49 are rejected under 35 U.S.C. § 102(a) as being
7 clearly anticipated by “Arles Image Web Page Creator” (hereinafter referred to as “Arles”).
8 Concurrently submitted with this response is a Declaration Under 37 CFR § 1.131 made by all of the
9 inventors, swearing behind the Arles reference. Also submitted is evidence comprising a document
10 entitled, “Usability Report” (Exhibit A), showing that the invention was conceived and actually
11 reduced to practice prior to the publication date of the cited reference. The pertinent dates are
12 redacted in the enclosed copy of this document . Applicants believe that the declaration and this
13 document make clear that all of the elements of each claim of the application were conceived and
14 reduced to practice before the August 17, 2000 publication date of Arles. Arles is not *prima facie*
15 prior art, since it was published less than one year before the March 20, 2001 filing date of the
16 present application. Accordingly, in view of the enclosed declaration and evidence provided by the
17 enclosed document, the rejection of the above claims under 35 U.S.C. 102(a) over Arles should be
18 withdrawn.

19 Claims Rejected Under 35 U.S.C. § 103(a)

20 Claims 5, 7-9, 21, 23-25, 37, and 39-41 are rejected under 35 U.S.C. § 103(a) as being
21 unpatentable over Arles in view of U.S. Patent No. 6,675, 354 (Claussen et al., hereinafter referred to
22 as “Claussen”). However, because applicants have sworn behind Arles, Arles is not available as a
23 reference. The remaining cited art does not disclose or suggest all of the elements of the rejected
24 claims. Therefore, *prima facie* obviousness has not been established. Accordingly, the rejection of
25 Claims 5, 7-9, 21, 23-25, 37, and 39-41 under 35 U.S.C. 103(a) should be withdrawn.

26 In addition, Claims 10-13, 26-29, and 42-45 are rejected under 35 U.S.C. § 103(a) as being
27 unpatentable over Arles in view of U.S. Patent No. 6,684, 369 (Bernardo et al., hereinafter referred to
28 as “Bernardo”). However, because applicants have sworn behind Arles, Arles is not available as a
29 reference. The remaining cited art does not disclose or suggest all of the elements of the rejected

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1 claims. Therefore, *prima facie* obviousness has not been established. Accordingly, the rejection of
2 Claims 10-13, 26-29, and 42-45 should be withdrawn.

3 Claims Objected To

4 The Examiner has objected to Claims 14, 30, and 46 as being dependent upon a rejected base
5 claim, but has indicated that these claims would be allowable if rewritten in independent form,
6 including all of the limitations of the base claim and any intervening claims. At this time, applicants
7 elect not to take any such action. Since Arles is not available as a reference, it is apparent that all
8 independent claims are patentable over the cited art.

9 In view of the preceding remarks and the enclosed declaration swearing behind Arles, it will
10 be apparent that the claims in this case define a novel and non-obvious invention, and that the
11 application is in condition for allowance and should be passed to issue without further delay. Should
12 any further questions remain, the Examiner is invited to telephone applicant's attorney at the number
13 listed below.

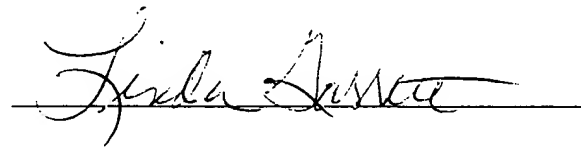
14 Respectfully submitted,

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16
17 Ronald M. Anderson
18 Registration No. 28,829

19 RMA/SKM:lrg

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21 I hereby certify that this correspondence is being deposited with the U.S. Postal Service in a
22 sealed envelope as first class mail with postage thereon fully prepaid addressed to: Commissioner for
23 Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on June 10, 2004.

24 Date: June 10, 2004



25 Enclosures:

26 Declaration Under 37 C.F.R. § 1.131
27 Exhibit A
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